

## JURY TRIAL REQUESTED

5. On or about June 20, 2021, the Plaintiffs, Mikiala Collains and LaDena Lewis, were theme park guests at Indiana Beach Amusement and Water Park Resort.

6. During a ride known as Rocky's Rapids Log Flume, the Plaintiffs were in a compartment that broke off of the ride track and flipped into a cement wall.

7. The Plaintiffs had to tip their seating compartment back onto the track in order to exit the ride.

8. The violent accident was caused by the negligence of Defendant, who failed to properly maintain the Rocky's Rapids Log Flume ride and mitigate the dangerous conditions that led to the ride derailing and injuring the Plaintiffs.

9. The Defendant is liable for damages to the Plaintiffs for their negligent actions which caused the accident described herein.

10. As a direct and proximate result of Defendant's negligence, Plaintiffs sustained personal injuries, some of which are permanent in nature. In order to treat their injuries and to lessen their pain and suffering, Plaintiffs engaged the services of hospitals, physicians, and radiologists for medical care and diagnostic testing.

11. As a direct and proximate result of the Defendant's negligence, Plaintiffs experienced deep mental anguish, emotional distress, and pain and suffering for their physical injuries, all of which may continue for an indefinite period.

12. As a result of the collision described herein and the injuries to the Plaintiffs resulting therefrom, Plaintiffs' quality of life has been diminished.


13. As a direct and proximate result of Defendant's negligence, Plaintiffs have been otherwise damaged.

WHEREFORE, Plaintiffs, Mikiala Collains and LaDena Lewis, pray for judgment in their favor and against Defendant, Indiana Beach Holdings LLC, in an amount commensurate with their

injuries and damages, for the cost of this action, for trial by jury, and for all other relief just and proper in the premises.

Respectfully Submitted,

FLORES LAW GROUP, LLC



---

Enrique Flores, Jr., Attorney No. 28855-49  
Attorney for Plaintiffs

**REQUEST FOR JURY TRIAL**

Plaintiff, by counsel, respectfully requests that a jury try the above matter.

Respectfully Submitted,

FLORES LAW GROUP, LLC

A handwritten signature in blue ink, appearing to be 'Enrique Flores', is written over a horizontal line.

Enrique Flores, Atty. No. 28855-49  
Attorney for Plaintiffs

**FLORES LAW GROUP, LLC**  
401 East Michigan Street, Ste. 301  
Indianapolis, Indiana 46204  
Tel: (317) 900-2556  
Fax: (317) 942-0119  
Email: [Enrique@thefloreslawgroup.com](mailto:Enrique@thefloreslawgroup.com)